



WILLIAMS, PORTER, DAY & NEVILLE P.C.  
*Wyoming's Law Firm*

## Exhibit B

Amazon Defendants' Motion for Protective Order

*DeBeer v. Amazon Logistics, Inc., et al.*

Stuart Day WSB #5-2244  
 WILLIAMS, PORTER, DAY & NEVILLE, P.C.  
 159 North Wolcott, Suite 400 (82601)  
 P. O. Box 10700  
 Casper, WY 82602  
 307-265-0700 telephone  
 307-266-2306 facsimile  
 sday@wpdn.net

*Attorneys for Amazon Defendants*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF WYOMING**

KIMBERLY DEBEER, surviving spouse and )  
 wrongful death personal representative of )  
 DANIEL DEBEER, deceased, )  
 )  
 Plaintiffs, )  
 )  
 v. )  
 )  
 AMAZON LOGISTICS, INC. d/b/a )  
 PRIME, AMAZON.COM, INC., )  
 AMAZON.COM SERVICES LLC, )  
 AAF555 LLC, NORTHWEST EXPRESS, LLC, )  
 ASD EXPRESS, LLC, and JUSTIN NZARAMBA )  
 )  
 Defendants. )

Civil No. 23-CV-33-ABJ

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**AMAZON LOGISTICS, INC. D/B/A PRIME, AMAZON.COM, INC., AND AMAZON.COM SERVICES,  
 LLC’S RULE 26(a)(1) INITIAL DISCLOSURES**

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Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendants Amazon Logistics, Inc., Amazon.com, Inc., and Amazon.com Services LLC (hereinafter collectively referred to as “Amazon” or individually by name), by and through their counsel, hereby provides their initial disclosures as follows:

*Remainder of page intentionally left blank.*

**DISCLAIMER**

The following routine discovery is provided in compliance with FED. R. CIV. P. 26(a)(1). Compliance with the Rule requires the disclosure of potential witnesses likely to have discoverable information that Amazon *may* use to support their claims or defenses, and the disclosure of documents that Amazon *may* use to support their claims or defenses. While Amazon has in its investigation discovered the names of witnesses and documents set forth below, it is not listing them as witnesses or exhibits to be introduced at the trial of this matter. Rather, it is simply complying with the requirements of FED. R. CIV. P. 26(a)(1) in a good faith disclosure of potential witnesses and documents. Amazon reserves the right to contest the relevancy and admissibility of the disclosed witnesses and documents, if necessary, based upon further discovery in this case.

**Rule 26(a)(1)(A)(i):** The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

1. **Kimberly DeBeer.** Kimberly DeBeer is the Plaintiff bringing her *Complaint* and as the wrongful death personal representative of Danial DeBeer against the Defendants including Amazon. Mrs. DeBeer may have knowledge and information regarding the claims and allegations surrounding the subject accident on March 31, 2021 that took place on Interstate 80 near Milepost 104 in Sweetwater County, Wyoming. Mrs. DeBeer may have knowledge and information regarding the events leading up to and following the accident which is the subject of the above captioned action. Mrs. DeBeer is expected to have knowledge and information concerning her claims, claims brought on behalf of the Wrongful Death Estate of Daniel DeBeer, and all matters alleged in Plaintiff's *Complaint*.

Address: c/o Matthew E. Wright, *Pro Hac Vice*  
The Law Firm for Truck Safety, LLP  
840 Crescent Centre Drive, Suite 310  
Franklin, Tennessee 37067  
Telephone: (615) 455-3588

2. **D&H Waste Solutions & Cattle Barns.** Upon information and belief, Mr. DeBeer was an owner and operator of D&H Waste Solutions & Cattle Barns (hereinafter “D&H Waste”). One or more representatives of D&H Waste may have knowledge and information regarding the subject accident on March 31, 2021 that took place on Interstate 80 near Milepost 104 in Sweetwater County, Wyoming. One or more representatives of D&H Waste may have knowledge and information regarding Mr. DeBeer’s trip including, but not limited to, driver logs, bills of lading, GPS tracking, reports, statements, and communications with all witnesses and involved parties. These representatives may also have knowledge and information regarding its operation history, work history of Mr. DeBeer, economic information and other matters relevant to the claims and damages sought by Plaintiff. These representatives may also have knowledge and information regarding the events leading up to and following the accident which is the subject of the above captioned action.

Address: 14155 300<sup>th</sup> Street  
Adrian, Minnesota 56110-3069  
Telephone: *Unknown*

3. **Northwest Express, LLC.** It is alleged that Northwest Express, LLC had a tractor-trailer that was being operated and involved in the accident that is the subject of Plaintiff’s *Complaint*. One or more representatives of Northwest Express, LLC, may have knowledge and information regarding the subject accident on March 31, 2021 that took place on Interstate 80 near Milepost 104 in Sweetwater County, Wyoming. These representatives may also have knowledge and information regarding the events leading up to and following the accident which is the subject of the above captioned action.

Address: c/o Zenith S. Ward  
BUCHHAMMER & WARD, P.C.  
P.O. Box 568  
Cheyenne, Wyoming 82003-0568  
Telephone: (307) 634-2184

4. **ASD Express, LLC.** One or more representatives of ASD Express, LLC, may have knowledge and information regarding the subject accident on March 31, 2021 that took place on Interstate 80 near Milepost 104 in Sweetwater County, Wyoming. These representatives may also have knowledge and information regarding the events leading up to and following the accident which is the subject of the above captioned action.

Address: 324 Inverrary Lane  
Deerfield, Illinois 60015  
Telephone: *Unknown*

5. **AAF55.** AAF55 is a named Defendant in this matter. One or more representatives of AAF55 may have knowledge and information concerning a third-party independent contractor contractual agreement entered into to haul the trailer/cargo allegedly involved in the incident giving rise to the allegations of Plaintiff’s *Complaint*. One or more representatives may also have knowledge and information concerning the tractor-trailer involved in the accident that is the subject of Plaintiff’s *Complaint* and agreements by AAF55 providing that tractor-trailer and its driver, and including any associated entities, was authorized and being operated. Further, one or

more representatives of AAF55 may have knowledge and information regarding the subject accident on March 31, 2021 that took place on Interstate 80 near Milepost 104 in Sweetwater County, Wyoming. These representatives may also have knowledge and information regarding the events leading up to and following the accident which is the subject of the above captioned action.

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 BUCHHAMMER & WARD, P.C.  
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 Cheyenne, Wyoming 82003-0568  
 Telephone: (307) 634-2184

6. **Justin Nzaramba.** Justin Nzaramba is a named defendant in Plaintiffs' *Complaint*. Mr. Nzaramba and may have knowledge and information regarding the claims and allegations surrounding the subject accident on March 31, 2021 that took place on Interstate 80 near Milepost 104 in Sweetwater County, Wyoming. Mr. Nzaramba may have knowledge and information regarding the events leading up to and following the accident which is the subject of the above captioned action.

Address: c/o Zenith S. Ward  
 BUCHHAMMER & WARD, P.C.  
 P.O. Box 568  
 Cheyenne, Wyoming 82003-0568  
 Telephone: (307) 634-2184

7. **Amazon Logistics, Inc., Amazon.com, Inc., and Amazon.com Services, LLC.** Amazon Logistics, Inc., Amazon.com, Inc., and Amazon.com Services, LLC ("Amazon") had a trailer that was being hauled by independent carrier(s) involved in the subject accident. Amazon are named defendants. One or more representatives of Amazon may have knowledge and information regarding claims set forth in Plaintiffs' *Complaint*.

Address: c/o Stuart R. Day  
 Williams, Porter, Day & Neville, P.C.  
 159 N. Wolcott, Suite 400  
 Casper, Wyoming 82601  
 Telephone: (307) 265-0700

8. **Timothy Rider.** Tim Rider was a first responder and operator/passenger in a vehicle in the westbound lane of I-80 following Justin Nzaramba's tractor-trailer at times relevant. Mr. Rider may have knowledge and information regarding the claims and allegations surrounding the subject accident. Mr. Rider may have knowledge and information regarding the events leading up to and following the accident which is the subject of the above captioned action.

Address: *Unknown*  
 Green River, Wyoming 82935  
 Telephone: XXX-XXX-5280

9. **Nancy Rider.** Nancy Rider was the first reporting party, responder and operator/passenger in a vehicle in the westbound lane of I-80 following Justin Nzaramba's tractor-trailer at times relevant. Ms. Rider may have knowledge and information regarding the claims and allegations surrounding the subject accident. Ms. Rider may have knowledge and information regarding the events leading up to and following the accident which is the subject of the above captioned action.

Address: *Unknown*  
Green River, Wyoming 82935  
Telephone: XXX-XXX-1868

10. **Gracie Puffer.** Gracie Puffer was a reporting party to the Wyoming Highway Patrol of the incident which is the subject of Plaintiff's *Complaint*. Ms. Puffer may have knowledge and information regarding the claims and allegations surrounding the subject accident. Ms. Puffer may have knowledge and information regarding the events leading up to and following the accident which is the subject of the above captioned action.

Address: *Unknown*  
Telephone: XXX-XXX-4983

11. **Brooke Todd.** Brooke Todd was a reporting party to the Wyoming Highway Patrol of the incident which is the subject of Plaintiff's *Complaint*. Ms. Todd may have knowledge and information regarding the claims and allegations surrounding the subject accident. Ms. Todd may have knowledge and information regarding the events leading up to and following the accident which is the subject of the above captioned action.

Address: *Unknown*  
Telephone: XXX-XXX-8771

12. **Employees of the Wyoming Highway Patrol.** Employees of the Wyoming Highway Patrol responded to or have knowledge and information concerning the subject accident including, but not limited to, Troopers: Joshua Powell, Ryan Wille, Marc Russell, Austin Bluemel, and Karl Germain. The extent of their personal knowledge and information is currently unknown, however, in general it is expected that they may have information regarding the evidence collected, witness interviews, inspections and investigations surrounding the subject accidents, events leading up to and following the accident which is the subject of the above captioned action.

Address: Wyoming Highway Patrol  
5300 Bishop Blvd.  
Cheyenne, WY 82009  
Telephone: (307) 777-4875

13. Amazon hereby incorporates the list of any potential witness that the other parties in this litigation have already listed.

14. Amazon reserves the right to supplement this list with any additional persons who may have any discoverable information, or persons needed to lay foundation for any relevant document that may become known in discovery. In addition, Amazon reserves the right to list any persons listed by any other party, any rebuttal witnesses and/or any impeachment witnesses.

**Rule 26(a)(1)(B):** A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

1. Wyoming Investigator’s Traffic Crash Report, Case No. 21-00030827 [AMAZON\_DEBEER000001-12];

2. Wyoming Highway Patrol Case Detail Report, Case No. 21-00030827 [AMAZON\_DEBEER000013-20];

3. Wyoming Highway Patrol Incident Details Report, Case No. 21-00030827 [AMAZON\_DEBEER000021-33];

4. Amazon Relay Carrier Terms of Service and Amazon Relay Program Policies, which is designated “Confidential” and will only be produced under the protection and requirements set forth in the Court’s *Stipulated Protective Order* upon entry;

5. Certificate of Liability Insurance, insured: AAF55 which is designated “Confidential” and will only be produced under the protection and requirements set forth in the Court’s *Stipulated Protective Order* upon entry;

6. Documents produced by any other party in discovery;

7. Amazon reserves the right to supplement the list of documents and things that may

become known as discovery continues. In addition, Amazon reserves the right to list any exhibit/document listed by any other party, rebuttal exhibit/document, and/or any impeachment exhibit/document.

**Rule 26(a)(1)(C):** A computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

1. Amazon is not seeking any damages from Plaintiffs; therefore, this subsection is inapplicable to it.

**Rule 26(a)(1)(D):** For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

1. Amazon believes it is entitled to coverage as an “additional insured” under one or more of its co-Defendant’s insurance policies. Please see disclosures of AAF55 Inc., in response to Federal Rule of Civil Procedure 26(a)(1)(D). Secondary to any insurance policies issued to any codefendant, Amazon maintains insurance applicable which has been requested and will be designated “Confidential” and will only be produced under the protection and requirements set forth in the Court’s *Stipulated Protective Order* upon entry.

*Remainder of page intentionally left blank.*

DATED this 30th day of June 2023.

AMAZON LOGISTICS, INC., AMAZON.COM,  
INC., AND AMAZON.COM SERVICES LLC,  
Defendants.

/s/ Stuart R. Day  
Stuart R. Day, WSB 5-2244  
WILLIAMS, PORTER, DAY & NEVILLE, P.C.  
159 North Wolcott, Suite 400 (82601)  
P. O. Box 10700  
Casper, WY 82601  
307-265-0700 telephone  
307-266-2306 facsimile  
Email: [sday@wpdn.net](mailto:sday@wpdn.net)

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a true and correct copy of the foregoing was served upon all counsel of record, specifically provided below, by electronic service this 30th day of June 2023.

Grant H. Lawson  
Joseph P. Chenchar  
Metier Law Firm, LLC  
259 S. Center, Suite 301  
Casper, WY 82601  
Mailing: 4828 South College Avenue  
Fort Collins, CO 80525  
(307) 237-3800 Phone  
(930) 225-1476 Fax  
[grant@metierlaw.com](mailto:grant@metierlaw.com)  
[joe@metierlaw.com](mailto:joe@metierlaw.com)

*Attorneys for Plaintiff*

Matthew E. Wright, *Pro Hac Vice*  
The Law Firm for Truck Safety, LLP  
840 Crescent Centre Drive, Suite 310  
Franklin, Tennessee 37067  
(615) 455-3588  
[matt@truckaccidents.com](mailto:matt@truckaccidents.com)

*Attorneys for Plaintiff*

George “Jed” Chronic, *Pro Hac Vice*  
Maschka, Riedy, Ries & Frentz  
151 Saint Andrews Court, Building 1010  
Mankato, MN 56001  
(507) 625-6600 Phone  
(507) 625-4002 Fax  
[jchronic@mrr-law.com](mailto:jchronic@mrr-law.com)

*Attorneys for Plaintiff*

Zenith S. Ward  
Buchhammer & Ward, P.C.  
1821 Logan Ave.  
P.O. Box 568  
Cheyenne, WY 82003-0568  
(307) 634-2184 Phone  
[zsw@wyoming.com](mailto:zsw@wyoming.com)

*Attorneys for Defendants Northwest Express,  
LLC and Justin Nzaramba*

/s/ Stuart R. Day  
Stuart R. Day